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November 15, 2023

The Honorable Andrew B. Altenburg, Jr., U.S.B.J.
Courtroom #4B
400 Cooper Street, 4th Floor
Camden, NJ 08101

RE: Sharon Lynn Wilson. Aka Sharon Lynn Wilson
Case No. 22-16349-ABA
Premises: 4 Fairmont Dr., Willingboro, NJ 08046
Secured Creditor: PNC Bank, National Association

Dear Judge Altenburg:

This office represents PNC Bank, National Association (“Secured Creditor”), holder of a mortgage on real property located at 4 Fairmont Dr., Willingboro, NJ 08046. Please accept this letter in response to

Debtor’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The Debtor is required to request an updated formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. The current payoff is approximately \$232,557.14. Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not

intend to appear to prosecute an objection at this time unless the proposed order is amended to a form deemed objectionable.

Respectfully,
KML LAW GROUP, P.C.

/s/ Denise Carlon
Denise Carlon, Esquire
dcarlon@kmlawgroup.com
Attorney for Secured Creditor

Caption in Compliance with D.N.J. LBR-9004-1

KML Law Group, P.C.
By: Denise Carlon Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
Attorneys for Secured Creditor: PNC BANK,
NATIONAL ASSOCIATION

In Re:
Sharon Lynn Wilson a/k/a Sharon Lynn
Wilson
Debtor

Case No: 22-16349 ABA
Chapter: 13
Judge: Andrew B. Altenburg Jr.

CERTIFICATION OF SERVICE

1. I, Patricia Rychards :

☐ Represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Denise Carlon, who represents the Secured Creditor in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On 11/16/2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 11/16/2023

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
<p>Sharon Lynn Wilson a/k/a Sharon Lynn Wilson 37 Rowland Street Palmyra, NJ 08065</p>	<p>Debtor</p>	<p> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>
<p>Richard S. Hoffman Jr. Hoffman DiMuzio 412 Swedesboro Road Mullica Hill, NJ 08062</p>	<p>Attorney for Debtor</p>	<p> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>
<p>Andrew B. Finberg Esq. Chapter 13 Standing Trustee Cherry Tree Corporate Center - 535 Route 38 - Suite 580 Cherry Hill, NJ 08002</p>	<p>Chapter 13 Trustee</p>	<p> <input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>